

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commission's Rules)	WT Docket No. 05-235
To Implement WRC-03 Regulations Applicable to)	
Requirements for Operator Licenses in the)	RM-10781, RM-10782, RM-10783,
Amateur Radio Service)	RM-10784, RM-10785, RM-10786,
)	RM-10787, RM-10805, RM-10806,
)	RM-10807, RM-10808, RM-10809,
)	RM-10810, RM-10811, RM-10867,
)	RM-10868, RM-10869, RM-10870

COMMENTS OF NO CODE INTERNATIONAL

No Code International ("NCI") is a not-for-profit organization of licensed radio amateurs, as well as those interested in amateur radio, but not yet licensed. NCI was founded in 1997 and has experienced continuous rapid growth since then, both within the U.S. and internationally. While NCI is an international organization, with thousands of members in 63 countries and active national chapters in 12 countries, including the U.S., a significant majority of NCI's members are U.S. licensed amateurs.

NCI was an active participant in WT Docket No. 98-143¹, wherein the Commission reduced the Morse code proficiency test requirement to the 5 wpm minimum that it believed would be compliant with unwaivable obligations for Morse testing under the ITU Radio Regulations in effect at that time² – an obligation that was eliminated by the revision of S25.5 of the ITU Radio Regulations at WRC-03.

NCI also previously filed a Petition for Rulemaking with the Commission³, which was placed on public notice as RM-10786 and substantially asked the Commission to take the action it now proposes in the instant NPRM.

NCI is, therefore, an interested party in this Proceeding and appreciates the opportunity to file these timely-filed comments.

¹ See generally the Report and Order, FCC 99-412, adopted Dec. 22, 1999, released Dec. 30, 1999.

² See the Report and Order, FCC 99-412, adopted Dec. 22, 1999, released Dec. 30, 1999, at 25-26.

³ See generally NCI's Petition for Rulemaking at:
http://gullfoss2.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6514783659

NCI Commends the Commission for its Forward-thinking Proposal and Urges the Commission to Adopt the NPRM's Proposals at the Earliest Possible Opportunity

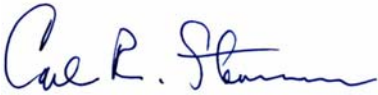
NCI commends the Commission for its proposal to eliminate the requirement that individuals pass a telegraphy examination in order to qualify for any amateur radio operator license.

NCI fully concurs with the Commission's conclusion in the NPRM that this step will:

“ ... (1) encourage individuals who are interested in communications technology, or who are able to contribute to the advancement of the radio art, to become amateur radio operators; (2) eliminate a requirement that we believe is now unnecessary and that may discourage amateur service licensees from advancing their skills in the communications and technical phases of amateur radio; and (3) promote more efficient use of the radio spectrum currently allocated to the amateur radio service.”⁴

NCI therefore respectfully requests that the Commission move forward at the earliest possible opportunity to issue a Report and Order making the changes to its rules proposed in the NPRM.

Respectfully submitted,



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⁴ See the NPRM, at 3.